



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR- 6J

November 4, 2014

Mr. Chase Fortenberry  
Georgia-Pacific LLC  
133 Peachtree Street NE  
Atlanta, GA 30303

RE: Area 1: Final Approval of Feasibility Study Report

Dear Mr. Fortenberry:

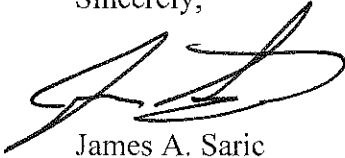
The U.S. Environmental Protection Agency (EPA) has completed its review of the Area 1 draft Feasibility Study (FS) report, submitted on June 16, 2014, for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. This draft FS report was approved with modifications by EPA on March 13, 2014. The FS report presents the evaluation of remedial alternatives for Area 1 of the Kalamazoo River from Morrow dam to the former Plainwell dam, and includes portions of Portage Creek from Alcott Street to the confluence of the Kalamazoo River.

Georgia-Pacific LLC (GP) has adequately incorporated EPA's previous comments. In September, EPA Region 5 representatives met with the EPA Contaminated Sediment Technical Advisory Group regarding the array of alternatives in the Area 1 FS report. As a result of that meeting, EPA believes there are a few clarifications that will further improve the FS report.

Therefore, EPA approves the Area 1 FS report. However, EPA has enclosed a few clarification comments which will require GP to modify the FS report. Pursuant to the 2007 Agreement on Consent the final FS report incorporating EPA's comments is due (45) forty-five days after receipt of this letter. This final version of the FS will be distributed to the public and made part of the administrative record. Further, EPA anticipates holding a public meeting to discuss the array of alternatives in the Area 1 FS report in December.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Saric', with a stylized, looping flourish at the end.

James A. Saric  
Remedial Project Manager  
SFD Remedial Response Branch #1

Enclosure

cc: Paul Bucholtz, MDNRE  
Garry Griffith, Georgia-Pacific  
Richard Gay, Weyerhaeuser  
Jamie McCarthy, KRWC

# **US EPA FINAL COMMENTS ON THE AREA 1 FEASIBILITY STUDY REPORT**

## **GENERAL COMMENTS**

**Commenting Organization: USEPA**  
**General Comment #: 1**

**Commenter: Saric**

The discussion of background concentrations for both fish and sediment must be further highlighted in the FS. This is important as these background concentrations could be realistic endpoints. Only through long-term monitoring will it be determined if Morrow Lake, Ceresco Reservoir, or another location represents the best background location.

**Commenting Organization: USEPA**  
**General Comment #: 2**

**Commenter: Saric**

When discussing the time period for each sediment remedy to meet remedial action objectives, make sure the time period covers all of Area 1, and is not only specific to the remedial reach portion of Area 1.

**Commenting Organization: USEPA**  
**General Comment #: 3**

**Commenter: Saric**

It appears the sediment replacement value used in sediment remedy S-5 may be too high and/or there is no credit for recovery during the 10 year construction period. This would result in the time for sediment remedy S-5 to meet remedial action objectives to be reduced. This time period may need to be adjusted.

**Commenting Organization: USEPA**  
**General Comment #: 4**

**Commenter: Saric**

Given the differences in SWAC reduction between sediment remedies S-3 and S-4, the FS needs to clarify why the difference between meeting remedial action objectives is only two years.

**Commenting Organization: USEPA**  
**General Comment #: 5**

**Commenter: Saric**

It appears that the cost estimates presented in Table 4-9 (S-5), as compared to Tables 4-5 through 4-8 (S-3 and S-4), use higher estimates of contingency on capital costs (45% vs. 35%), project and construction management (10% vs. 5%), and pre-remedial design/sampling/planning (\$2.4 million vs. \$0.33 million). For the purposes of this FS, the contingency, project management and construction percentages should be the same across all alternatives.

## SPECIFIC COMMENTS

Commenting Organization: USEPA  
Section: Table 1-23      Page #:  
Specific Comment # 1

Commenter: Dillon  
Lines #:

The table currently lists the shrew RBCs and percent home ranges under the high sensitivity columns only. This is misleading and suggests that the shrew RBCs are somewhat analogous to the sensitivity range for the avian RBCs. The table does footnote that there is no distinction between high and low sensitivity for the shrew RBCs. Please add the RBCs and per cent home ranges to the mid-sensitivity columns. The footnote should remain as is.

Commenting Organization: USEPA  
Section: 2.3      Page #: 2-5 and 2-7  
Specific Comment # 2

Commenter: Saric  
Lines #:

Please make the following text changes in bold. On page 2-5 change the text to read as follows:

*"The following State requirement was reviewed, but was concluded to not be an ARAR for runoff from floodplain soils because although there will be discharges to surface water from each of the remedies described herein, the floodplains are nonpoint source and none of the remedies included herein anticipate discharges into the river from point sources:*

*Part 8 of NREPA as it relates to water quality based effluent limits (WQBELs) for point sources."*

On page 2-7 change the text to read as follows:

*At the state level, chemical-specific ARARs applicable to water may include the provisions of Part 31 (Water Resources Protection) of the NREPA, MCL324.3101 et seq, and the rules promulgated under Part 31 at Mich. Admin. Code R. 323.1041-1097 and R. 323.1100-1117 (Part 4 Rules), R. 323.1201-1221 (Part 8 Rules), and R. 323.1211-1329 (Part 13 Rules). These provisions provide the water quality standards for surface waters in Michigan and establish permit requirements for alterations of floodplains and discharges to surface waters. Criteria are applicable to venting groundwater, storm water, and discharges associated with remedial action work.*

*The provisions of the Part 8 Rules (also promulgated under Part 31) and found at Mich. Admin. R. 323.1201-1221 are relevant and appropriate. The Part 8 Rules establish toxic substance WQBELs for point source discharges.*

Commenting Organization: USEPA  
Section: Table 2-10      Page #:  
Specific Comment # 3

Commenter: Dillon  
Lines #:

As with Table 2-13, please add the RBCs for the fox and shrew to the mid-sensitivity columns. In addition add a footnote stating that they are the same for these species.

Commenting Organization: USEPA

Commenter: Keiser

Section: 4

Page #: 4-16, 1<sup>st</sup> Para

Lines #:

Specific Comment # 4

*"It is important to note that PCB mass is not a predictor of ecological or human health risks. Rather, it is the exposure concentration that is used to determine whether risk to human health and the environment are within an acceptable range."*

The text should be revised to include that for Alternatives 4-A (4-B) less mass would be remain for downstream transport, this addresses RAO 4 to a greater degree than SA-3A (3B).

Note "important" is misspelled in the text.